

**Snead, Adrian F.**

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**From:** Boyle, Dennis E.  
**Sent:** Thursday, September 27, 2018 10:36 AM  
**To:** Jasari, Blerina; Gomez, Javier; Snead, Adrian F.  
**Subject:** Fwd: United States v. Bennett

Sent from my iPhone

Begin forwarded message:

**From:** "Michael G. Vartanian" <[MVartanian@dickinson-wright.com](mailto:MVartanian@dickinson-wright.com)>  
**Date:** September 26, 2018 at 10:14:32 PM EDT  
**To:** "[WZapf@kaiserdillon.com](mailto:WZapf@kaiserdillon.com)" <[WZapf@kaiserdillon.com](mailto:WZapf@kaiserdillon.com)>, "[dboyle@wtplaw.com](mailto:dboyle@wtplaw.com)" <[dboyle@wtplaw.com](mailto:dboyle@wtplaw.com)>  
**Subject:** Fwd: United States v. Bennett

FYI.

**Michael G. Vartanian** Member

350 S. Main Street  
Suite 300  
Ann Arbor MI 48104  
Phone 734-623-1690  
Mobile 313-320-7525  
Fax 844-670-6009  
Email [MVartanian@dickinsonwright.com](mailto:MVartanian@dickinsonwright.com)



Begin forwarded message:

**From:** "Windom, Thomas (USAMD)" <[Thomas.Windom@usdoj.gov](mailto:Thomas.Windom@usdoj.gov)>  
**Date:** September 26, 2018 at 8:58:12 PM EDT  
**To:** "Michael G. Vartanian" <[MVartanian@dickinson-wright.com](mailto:MVartanian@dickinson-wright.com)>  
**Cc:** "Bernstein, Gregory (USAMD)" <[Gregory.Bernstein@usdoj.gov](mailto:Gregory.Bernstein@usdoj.gov)>, "Pulice, Erin (USAMD)" <[Erin.Pulice@usdoj.gov](mailto:Erin.Pulice@usdoj.gov)>, "Windom, Thomas (USAMD)" <[Thomas.Windom@usdoj.gov](mailto:Thomas.Windom@usdoj.gov)>  
**Subject:** RE: United States v. Bennett

Mr. Vartanian –

Thank you for the email. I'm ccin'g my co-counsel here.

Please call me at 10am eastern Thursday at 301-344-0197. With respect to other tainted property, we can discuss more tomorrow. In general, though, virtually all of Ms. Bennett's assets likely are tainted – which is why your firm specifically told Judge Xinis

that the only monies your firm would be paid with came from untainted assets, and that your firm would come back to the court if you were going to try to use any other assets for payment. So the bottom line is your firm should not be selling anything of Ms. Bennett's.

When we speak, I also would like to get clarity on if and when your firm (and all of its attorneys) actually quit representing Ms. Bennett, in any capacity.

Thank you, and again please call me at 10am eastern Thursday.

tw

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**From:** Michael G. Vartanian <[MVartanian@dickinson-wright.com](mailto:MVartanian@dickinson-wright.com)>  
**Sent:** Wednesday, September 26, 2018 5:17 PM  
**To:** Windom, Thomas (USAMD) <[twindom@usa.doj.gov](mailto:twindom@usa.doj.gov)>  
**Subject:** Fwd: United States v. Bennett

Mr. Windom,

I am Dickinson Wright's General Counsel. I will call you tomorrow morning. In the meantime, other than the gems purchased from Astrological Gems, is there any personal property located in Ms. Bennett's condos, i.e. furniture, piano, clothing, or other jewelry, that the government claims is tainted property?

**Michael G. Vartanian** Member

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Begin forwarded message:

**From:** "Andrew L. Sparks" <[ASparks@dickinson-wright.com](mailto:ASparks@dickinson-wright.com)>  
**Date:** September 26, 2018 at 4:08:01 PM EDT  
**To:** "Michael G. Vartanian" <[MVartanian@dickinson-wright.com](mailto:MVartanian@dickinson-wright.com)>  
**Subject:** FW: United States v. Bennett

**Andrew L. Sparks** Of Counsel

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**From:** Windom, Thomas (USAMD) <[Thomas.Windom@usdoj.gov](mailto:Thomas.Windom@usdoj.gov)>  
**Sent:** Wednesday, September 26, 2018 4:06 PM  
**To:** Jeff Craven <[JCraven@dickinson-wright.com](mailto:JCraven@dickinson-wright.com)>  
**Cc:** Andrew L. Sparks <[ASparks@dickinson-wright.com](mailto:ASparks@dickinson-wright.com)>; Ryan K. Hart <[RHart@dickinson-wright.com](mailto:RHart@dickinson-wright.com)>; Jacob S. Frenkel <[JFrenkel@dickinson-wright.com](mailto:JFrenkel@dickinson-wright.com)>; Windom, Thomas (USAMD) <[Thomas.Windom@usdoj.gov](mailto:Thomas.Windom@usdoj.gov)>; Pulice, Erin (USAMD) <[Erin.Pulice@usdoj.gov](mailto:Erin.Pulice@usdoj.gov)>; Bernstein, Gregory (USAMD) <[Gregory.Bernstein@usdoj.gov](mailto:Gregory.Bernstein@usdoj.gov)>  
**Subject:** United States v. Bennett

Mr. Craven –

I write regarding the forfeiture of certain proceeds of Dawn Bennett. As you are aware, a federal grand jury for the District of Maryland returned a superseding indictment charging Ms. Bennett with a variety of criminal conduct, including securities fraud, wire fraud, and bank fraud. The superseding indictment contains a forfeiture allegation stating that the defendant shall forfeit any property constituting, or derived from, proceeds traceable to or obtained, directly or indirectly, from the various crimes.

Among other things, and as discussed in summary fashion in the criminal complaint affidavit that pre-dated the superseding indictment, the Government's investigation shows that Ms. Bennett purchased certain gems from Astrological Gems, and that those purchases were made with fraud money.

I understand that you are trying to sell some of Ms. Bennett's assets, including certain gems she purchased from Astrological Gems. We request that you immediately cease your attempts to sell Ms. Bennett's tainted property. You are on notice, as you have been for some time, that the gems likely were purchased with fraud money, and yet you nonetheless are attempting to sell them. Your failure to honor this request will result in the Government exercising its remedies under the forfeiture laws, including, but not limited to, seeking recourse from Judge Xinis, obtaining a seizure warrant, and holding you and your firm liable for any forfeitable assets received and conveyed.

Please have your firm's General Counsel contact me immediately at 301-344-0197. If we do not have your written assurance by noon Thursday 9/27 that no assets will be sold, we will file an appropriate motion with Judge Xinis.

tw

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